

EXHIBIT 9

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FOURTEENTH JUDICIAL CIRCUIT
COUNTY OF HAMPTON)	
 Jessica S. Cook, <i>et al.</i> ,)	 CASE NO. 2017-CP-25-00348
)	
Plaintiffs,)	
)	
vs.)	SANTEE COOPER'S ANSWERS TO
)	PLAINTIFFS' MARCH 6, 2019
South Carolina Public service Authority,)	INTERROGATORIES
<i>et al.</i> ,)	
)	
Defendants.)	
)	

Pursuant to Rules 26 and 33 of the South Carolina Rules of Civil Procedure, Defendant South Carolina Public Service Authority ("Santee Cooper") hereby answers Plaintiffs' March 6, 2019 Interrogatories.

INTERROGATORIES

1. Please state with specificity (to the nearest penny) the amount Santee Cooper collected from direct customers related to Santee Cooper's involvement in V.C. Summer Units 2 and 3 from 2008 to the present. In responding, please provide these amounts by year. For 2019, please provide this information monthly including current projections for each month in 2019.

ANSWER: Santee Cooper issues Revenue Obligation bonds at system level, *pari passu* (all bonds have equal rights and receive equal treatment regardless of the purpose or project for which proceeds are used), and secured by a lien and charge on revenues and moneys in the Revenue Fund of the Authority, rather than specific assets. For purposes of this interrogatory, however, we have assumed a direct relationship between V.C. Summer Units 2 and 3 costs, the debt issued to satisfy those costs, and the revenues received from customers used to pay the debt service.

This response incorporates debt service savings achieved using Toshiba Parental Guaranty funds ("Toshiba Funds") for debt defeasance and avoidance.

Under these assumptions, the chart below details the estimated annual amounts the Authority collected from retail customers related to Santee Cooper's involvement in V.C. Summer Units 2 and 3:

Year	Estimated Amount
2008	\$1,240,497.26
2009	\$8,052,532.42
2010	\$11,784,888.72
2011	\$6,063,813.91
2012	\$7,936,392.33
2013	\$11,205,050.85
2014	\$24,380,576.81
2015	\$32,117,749.82
2016	\$21,842,799.65
2017	\$31,360,741.88
2018	\$22,339,553.41

Under these assumptions, the chart below details the estimated 2019 projected monthly amounts Santee Cooper collected from retail customers related to Santee Cooper's involvement in V.C. Summer Units 2 and 3:

Month	Estimated Projected Amount
January	\$1,992,076.58
February	\$1,808,230.96
March	\$1,567,942.34
April	\$1,343,428.02
May	\$1,647,939.24
June	\$1,917,333.35
July	\$2,009,415.44
August	\$1,985,000.35
September	\$1,772,951.22
October	\$1,357,146.11
November	\$1,430,337.02
December	\$1,778,457.70

Santee Cooper's answer to this interrogatory is made subject to its objections that this interrogatory assumes facts not in evidence and because "related to Santee Cooper's involvement" is vague and ambiguous. Further, Santee Cooper objects to this interrogatory as overly broad and unduly burdensome because it seeks specific amounts to the nearest penny—as stated, these are estimates based on assumptions.

2. Please state with specificity (to the nearest penny) the amount Santee Cooper collected from Central Electric Power Cooperative related to Santee Cooper's involvement in V.C. Summer Units 2 and 3 from 2008 to the present. In responding, please provide these amounts by year. For 2019, please provide this information monthly including current projections for each month in 2019.

ANSWER: Santee Cooper issues Revenue Obligation bonds at system level, *pari passu* (all bonds have equal rights and receive equal treatment regardless of the purpose or project for which proceeds are used), and secured by a lien and charge on revenues and moneys in the Revenue Fund of the Authority, rather than specific assets. For purposes of this interrogatory, however, we have assumed a direct relationship between V.C. Summer Units 2 and 3 costs, the debt issued to satisfy those costs, and the revenues received from customers used to pay the debt service.

This response incorporates debt service savings achieved using Toshiba Funds for debt defeasance and avoidance.

Under these assumptions, the chart below details the estimated annual amounts the Authority collected from Central related to Santee Cooper's involvement in V.C. Summer Units 2 and 3:

Year	Estimated Amount
2008	\$3,076,588.29
2009	\$20,851,029.75
2010	\$31,075,330.44
2011	\$16,367,755.16
2012	\$22,282,287.53
2013	\$27,300,812.15
2014	\$58,900,902.75
2015	\$74,702,781.96
2016	\$51,112,258.20
2017	\$73,665,091.11
2018	\$52,056,341.66

Under these assumptions, the chart below details the estimated 2019 projected monthly amounts Santee Cooper collected from Central related to Santee Cooper's involvement in V.C. Summer Units 2 and 3:

Month	Estimated Projected Amount
January	\$5,015,961.13
February	\$4,804,376.50
March	\$4,267,902.71
April	\$3,060,624.44
May	\$3,618,414.29
June	\$4,229,150.71
July	\$4,247,745.18
August	\$4,046,879.08
September	\$3,856,645.46
October	\$3,225,937.80
November	\$3,799,899.71
December	\$4,458,173.77

Santee Cooper's answer to this interrogatory is made subject to its objections that this interrogatory assumes facts not in evidence and because "related to Santee Cooper's involvement" is vague and ambiguous. Further, Santee Cooper objects to this interrogatory as overly broad and

unduly burdensome because it seeks specific amounts to the nearest penny—as stated, these are estimates based on assumptions.

3. Please list each bond Santee Cooper issued related in whole or in part to Santee Cooper’s involvement in V.C. Summer Units 2 and 3. For each bond issued, please state bond counsel, the underwriter and underwriter’s counsel, the amount of the bond, the maturity date, the coupon rate, and the date the bond was issued.

ANSWER: Santee Cooper issues Revenue Obligation bonds at system level, pari passu (all bonds have equal rights and receive equal treatment regardless of the purpose or project for which proceeds are used), and secured by a lien and charge on revenues and moneys in the Revenue Fund of the Authority, rather than specific assets. For purposes of this interrogatory, however, we have assumed a direct relationship between V.C. Summer Units 2 and 3 costs, the debt issued to satisfy those costs, and the revenues received from customers used to pay the debt service.

See COOK-SC_00059296 produced herewith, for the details in answer to this interrogatory.

The listed bonds include both new money, the proceeds of which were used to fund nuclear construction and cost of issuance, and refunding bonds, the proceeds of which were used to refinance previously issued bonds and cost of issuance. As a result, the listed approximate nuclear par at issuance exceeds the proceeds received by the Authority and subsequently used to fund nuclear construction.

Santee Cooper’s answer to this interrogatory is made subject to its objections that this interrogatory assumes facts not in evidence and because “related in whole or in part to Santee Cooper’s involvement” is vague and ambiguous. Further, Santee Cooper objects to this interrogatory as overly broad and unduly burdensome because it seeks specific amounts to the nearest penny—as stated, these are approximations based on assumptions.

4. Please state with specificity (to the nearest penny) the amount of Santee Cooper's bond obligations presently outstanding related in whole or in part to Santee Cooper's involvement in V.C. Summer Units 2 and 3.

ANSWER: Santee Cooper issues Revenue Obligation bonds at system level, pari passu (all bonds have equal rights and receive equal treatment regardless of the purpose or project for which proceeds are used), and secured by a lien and charge on revenues and moneys in the Revenue Fund of the Authority, rather than specific assets. For purposes of this interrogatory, however, we have assumed a direct relationship between V.C. Summer Units 2 and 3 costs, the debt issued to satisfy those costs, and the revenues received from customers used to pay the debt service.

The answer excludes the potential benefit of Toshiba Funds, both for future projected debt defeasance and for debt avoidance. This answer includes reallocations of bonds, other than those attributable to use of Toshiba Funds, among non-V.C. Summer Units 2 and 3 projects through December 2018 but does not reflect any future or anticipated reallocations between projects.

Under these assumptions, the estimated amount of bonds related to V.C. Summer Units 2 and 3 outstanding as of the date of these answers is \$3,999,110,300.

Santee Cooper's answer to this interrogatory is made subject to its objections that this interrogatory assumes facts not in evidence and because "related in whole or in part to Santee Cooper's involvement" is vague and ambiguous. Further, Santee Cooper objects to this interrogatory as overly broad and unduly burdensome because it seeks specific amounts to the nearest penny—as stated, these are estimates based on assumptions.

5. For the time period 2008 through December 31, 2018, please state with specificity (to the nearest penny) by year the amount of interest Santee Cooper paid bondholders on bonds related in whole or in part to Santee Cooper's involvement in V.C. Summer Units 2 and 3.

ANSWER: Santee Cooper issues Revenue Obligation bonds at system level, pari passu (all bonds have equal rights and receive equal treatment regardless of the purpose or project for which proceeds are used), and secured by a lien and charge on revenues and moneys in the Revenue Fund of the Authority, rather than specific assets. For purposes of this interrogatory, however, we have assumed a direct relationship between V.C. Summer Units 2 and 3 costs, the debt issued to satisfy those costs, and the revenues received from customers used to pay the debt service.

Under these assumptions, the chart below details the estimated annual amount of interest paid to bondholders on bonds related to V.C. Summer 2 and 3 from 2008 through 2018. This estimate includes all interest payments to bondholders including interest that was capitalized and not recovered through rates. The estimated amounts do not include the benefit of the subsidy received from the United States Treasury Department to offset the interest on Build America Bonds because investors received the gross interest; Santee Cooper and its customers benefited from the subsidy received as a credit to their cost of service.

Year	Estimated Amount
2008	\$3,433,587.02
2009	\$28,903,562.17
2010	\$43,085,945.38
2011	\$67,052,870.27
2012	\$84,118,859.85
2013	\$100,579,799.11
2014	\$134,096,393.78
2015	\$173,404,887.81
2016	\$199,642,644.44
2017	\$209,615,425.81
2018	\$204,795,222.79

Santee Cooper's answer to this interrogatory is made subject to its objections that this interrogatory assumes facts not in evidence and because "related in whole or in part to Santee Cooper's involvement" is vague and ambiguous. Further, Santee Cooper objects to this interrogatory as overly broad and unduly burdensome because it seeks specific amounts to the nearest penny—as stated, these are estimates based on assumptions.

6. For the year 2019, please state with specificity (to the nearest penny) by month the amount of interest Santee Cooper has paid and expects to pay bondholders on bonds related in whole or in part to Santee Cooper's involvement in V.C. Summer Units 2 and 3.

ANSWER: Santee Cooper issues Revenue Obligation bonds at system level, *pari passu* (all bonds have equal rights and receive equal treatment regardless of the purpose or project for which proceeds are used), and secured by a lien and charge on revenues and moneys in the Revenue Fund of the Authority, rather than specific assets. For purposes of this interrogatory, however, we have assumed a direct relationship between V.C. Summer Units 2 and 3 costs, the debt issued to satisfy those costs, and the revenues received from customers used to pay the debt service.

Interest payments for bonds are made bi-annually, with expenses accrued over the preceding twelve months and funds set-aside each month to pay bondholders. For the purpose of responding to this interrogatory, however, we have estimated monthly interest by dividing 2019 interest owed by 12 as an approximation of the accrual view of interest expense:

Month	Estimated Projected Amount
January	\$17,001,446.36
February	\$17,001,446.36
March	\$17,001,446.36
April	\$17,001,446.36
May	\$17,001,446.36
June	\$17,001,446.36
July	\$17,001,446.36
August	\$17,001,446.36
September	\$17,001,446.36

October	\$17,001,446.36
November	\$17,001,446.36
December	\$17,001,446.36

Santee Cooper's answer to this interrogatory is made subject to its objections that this interrogatory assumes facts not in evidence and because "related in whole or in part to Santee Cooper's involvement" is vague and ambiguous. Further, Santee Cooper objects to this interrogatory as overly broad and unduly burdensome because it seeks specific amounts to the nearest penny—as stated, these are estimates based on assumptions.

7. Identify with specificity the name, terms and associated sale price of any proposed sale of Santee's partial ownership interest in V.C. Summer Units 2 and 3, or a portion thereof, to a prospective third party buyer.

ANSWER: Santee Cooper answers pursuant to Rule 33(c), SCRPC, by producing the following documents related to proposed sales of Santee Cooper's partial ownership interest from January 2008 to July 31, 2017: COOK-SC_00059284; CEPCI-SC_00296514; CEPCI-SC_00295605; COOK-SC_00059268; COOK-SC_00059194; COOK-SC_00059259; COOK-SC_00059257; COOK-SC_00059187; and CEPCI-SC_00295661.

Santee Cooper's answer is made subject to its objection to this Interrogatory as overly broad and unduly burdensome because it is not limited in temporal scope regarding the ending date. Santee Cooper also objects to this Interrogatory because "name . . . of any proposed sale" is vague and ambiguous. Santee Cooper further objects to this Interrogatory because "prospective third party buyer" is vague and ambiguous and is not defined.

8. State with specificity (to the nearest penny) the amount of debt issued by Santee Cooper after its Board of Directors entered a Resolution for the Purchase of a Partial Ownership Interest in the V.C. Summer Project by South Carolina Electric & Gas.

ANSWER: Santee Cooper issues Revenue Obligation bonds at system level, *pari passu* (all bonds have equal rights and receive equal treatment regardless of the purpose or project for

which proceeds are used), and secured by a lien and charge on revenues and moneys in the Revenue Fund of the Authority, rather than specific assets. For purposes of this interrogatory, however, we have assumed a direct relationship between V.C. Summer Units 2 and 3 costs, the debt issued to satisfy those costs, and the revenues received from customers used to pay the debt service.

This answer includes reallocations of bonds, other than reallocations attributable to use of Toshiba Funds, among projects through December 2018 but does not reflect any future or anticipated reallocations between projects. The answer also excludes the benefit of Toshiba Funds, both for future projected debt defeasance and for debt avoidance.

Under these assumptions, the estimated amount of new money bonds issued related to V.C. Summer Units 2 and 3 following the Authority's board resolution on January 27, 2014, to sell an ownership share to SCE&G is \$2,011,202,000. See COOK-SC_00059296 produced herewith, for the details in answer to this interrogatory.

Santee Cooper's answer to this interrogatory is made subject to its objection that this interrogatory is overly broad and unduly burdensome because it is not limited to debt associated with the V.C. Summer Units 2 and 3 project. Further, Santee Cooper objects to this interrogatory as overly broad and unduly burdensome because it seeks specific amounts to the nearest penny—as stated, these are estimates based on assumptions.

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